

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Kaleigh R. Dittus, Courtney A. Snyder,
and Joanna L. Tabler, all individually and on
behalf of all other similarly situated
individuals,

Plaintiffs,

v.

Case No. 3:14-cv-00300-JFA

K.E.G., Inc., d/b/a Heart Breakers
Gentlemen’s Club; Shadow Management
Company, Inc., d/b/a Platinum Plus
(Columbia); Splash, Inc., d/b/a
Platinum Plus (Columbia); Elephant, Inc.,
d/b/a Platinum Plus (Greenville);
KWE Group, LLC; KWON, LLC, d/b/a
Platinum West; Gregory Kenwood
Gaines a/k/a Ken Wood, and David A.
Henson

Defendants.

RULE 502(d) ORDER

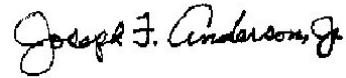
Whereas, the parties to this action (“parties”), have stipulated to the following protective order pursuant to Federal Rule of Evidence 502(d):

1. The production of privileged or work-product protected documents, electronically stored information (“ESI”) or information, whether inadvertent or otherwise, is not a waiver of the privilege or protection from discovery in this case or in any other federal or state proceeding. This Order shall be interpreted to provide the maximum protection allowed by Federal Rule of Evidence 502(d).
2. Nothing contained herein is intended to or shall serve to limit a party's right to conduct a review of documents, ESI or information (including metadata) for relevance,

responsiveness and/or segregation of privileged and/or protected information before production.

IT IS SO ORDERED.

May 27, 2014
Columbia, South Carolina

A handwritten signature in black ink, reading "Joseph F. Anderson, Jr." in a cursive script.

Joseph F. Anderson, Jr.
United States District Judge